

1 Sara J. O'Connell (*Pro Hac Vice*)  
soconnell@mcnamarallp.com  
2 Edward Chang (NV 11783)  
echang@mcnamarallp.com  
3 MCNAMARA SMITH LLP  
655 West Broadway, Suite 1600  
4 San Diego, California 92101  
Tel.: 619-269-0400  
5 Fax: 619-269-0401

6 Abran E. Vigil (NV 7548)  
vigila@ballardspahr.com  
7 BALLARD SPAHR LLP  
100 North City Parkway, Suite 1750  
8 Las Vegas, Nevada 89106-4617  
Tel.: 702-471-7000  
9 Fax: 702-471-7070

10 *Attorneys for Plaintiff*

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 THOMAS W. MCNAMARA, as the Court-  
Appointed Receiver for Ideal Financial  
14 Solutions, Inc.; Ascot Crossing, LLC; Chandon  
Group, Inc.; Bracknell Shore, Ltd.; Fiscal  
15 Fitness, LLC; Avanix, LLC; Debt Elimination  
Systems, LLC; US Debt Relief, LLC; Money  
16 Mastery, LLC; US Debt Assistance Corp.; IWB  
Services (St. Kitts); Financial Fitness, LLC;  
17 Debt to Wealth, LLC (St. Kitts); Debt to  
Wealth, LLC (Nevada); Ideal Goodness, LLC;  
18 Dollars West, LLC; Fluidity, LLC; Newport  
Sails, LLC; Shaw Shank, LLC; Bunker Hillside,  
19 LLC; Funding Guarantee, LLC; Newline Cash,  
LLC; Wealth Fitness, LLC; Zeal Funding  
20 Services, LLC; and related subsidiaries and  
affiliates,

21 Plaintiff,

22 v.

23 VOLTAGE PAY INC., a Canadian corporation  
doing business as voltagepay.com, Voltage  
24 Payments, Inc., and Voltage Pay LLC; KEVIN  
LEWIS; JETY HOLDINGS, a company of  
25 unknown origins; DAVID SHEHKTER;  
2170773 ONTARIO LIMITED, a Canadian  
26 corporation; and ROES 1-10.

27 Defendants.  
28

**Case No. 2:15-cv-02177-JAD-GWF**

**STIPULATED MOTION FOR  
DISMISSAL WITH PREJUDICE OF  
DEFENDANTS VOLTAGE PAY INC.,  
JETY HOLDINGS, KEVIN LEWIS,  
DAVID SHEHKTER, AND 2170773  
ONTARIO LIMITED**

Related Case:

*Federal Trade Commission v. Ideal Financial  
Solutions, Inc. et al.*, District of Nevada, Case  
No. 2:13-cv-00143-JAD-GWF

ECF No. 97

1 Plaintiff Thomas W. McNamara (the "Receiver" or "Plaintiff") and Defendants Voltage  
2 Pay Inc., Jety Holdings, Kevin Lewis, David Shekhter and 2170773 Ontario Limited  
3 (collectively, "Defendants" and, with Plaintiff, the "Parties") hereby jointly stipulate and move  
4 for an order dismissing all claims against Defendants in this action with prejudice.

5 As specified in the Settlement Agreement between Plaintiff and Defendants, the Court  
6 will retain jurisdiction over the Parties to enforce the Settlement Agreement and Mutual Release  
7 of Claims executed by the Parties.

8 The Parties shall bear their own costs and fees except as expressly provided in the  
9 Settlement Agreement and Mutual Release of Claims executed by the Parties.

10 IT IS SO STIPULATED.

11 Dated: December 4, 2017

Dated: December 4, 2017

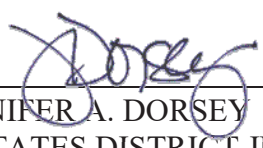
12 By: /s/ Edward Chang  
13 Edward Chang  
14 McNamara Smith LLP  
15 655 West Broadway, Suite 1600  
16 San Diego, CA 92101  
Tel.: 619-269-0400  
Fax: 619-269-0401  
echang@mcnamarallp.com  
Attorneys for Plaintiff

By: /s/ David P. Steiner  
David P. Steiner, Esq.  
David Steiner & Associates  
1801 Century Park East, Suite 1600  
Los Angeles, CA 90067  
Tel.: 310-557-8422  
Fax: 310-556-0336  
dpsartnetlaw@gmail.com  
Attorneys for Defendants

17  
18 **ORDER**

19 IT IS SO ORDERED:

20  
21 DATED: 12-8-17

22   
HON. JENNIFER A. DORSEY  
23 UNITED STATES DISTRICT JUDGE  
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26  
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